

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

W.R. GRACE & CO., *et al.*,

Debtors.

)
) Chapter 11
)
) Case No. 01-1139 (JKF)
) Jointly Administered
)
) Hearing Date: May 2, 2007 @ 2:00pm in Pittsburgh, PA
) Related Docket Nos.: 15005, 15185

**MOTION FOR LEAVE TO FILE A REPLY TO W.R. GRACE'S OBJECTION TO
MOTION TO COMPEL TESTIMONY AND DOCUMENT PRODUCTION
CONCERNING GRACE'S PRE-PETITION ESTIMATES OF ITS PERSONAL INJURY
ASBESTOS LIABILITY**

The Official Committee of Asbestos Personal Injury Claimants ("ACC") and David T. Austern, Legal Representative for Future Asbestos Personal Injury Claimants ("FCR") by and through its undersigned counsel, hereby moves for leave pursuant to Local Bankruptcy Rule 9006-1(d), to file the attached reply (the "Reply") to *W.R. Grace's Objection (the "Objection") to Motion to Compel Testimony and Document Production Concerning Grace's Pre-Petition Asbestos Liability Estimates* (the "Motion") (Docket No. 15185) which is currently scheduled for hearing before this Court on May 2, 2007 at 2:00 p.m.

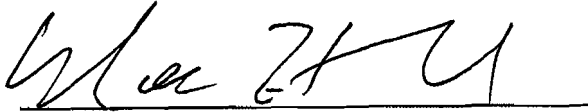
Leave should be granted for ACC and FCR to file a reply to the Objection, as the arguments of the Debtors raise various disputed issues, both legal and factual, to which the ACC and FCR should be given the opportunity to respond prior to the May 2, 2007 hearing. The ACC and FCR seek authorization to file the Reply attached hereto. The ACC and FCR assert that the attached Reply will clarify the remaining, and limited, issues that the Court will need to address at the hearing on the Motion.

WHEREFORE, the ACC and FCR respectfully request the entry of an Order granting them leave to file the Reply, which is attached hereto as Exhibit 1.

Date: April 24, 2007

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